

EXHIBIT 7

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

LORI LYNN HEETHUIS,

Case No. 1:19-cv-940

Plaintiff,

HON. PAUL L. MALONEY

v.

COUNTY OF MUSKEGON; and,
RYAN BOIKE, Individually,

Defendants.

Stephen R. Drew (P24323)
Adam C. Sturdivant (P72285)
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Laura S. Amtsbuechler (P36972)
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PLAINTIFF'S RESPONSE TO DEFENDANTS'
SECOND REQUEST FOR PRODUCTION OF DOCUMENTS

Plaintiff, Lori Heethuis, by her attorneys, DREW COOPER & ANDING, provides the following response to Defendants' Second Request for Production of Documents. Plaintiff reserves the right to supplement this response as additional information becomes available.

REQUEST FOR PRODUCTION OF DOCUMENTS

1. Produce itemized cell phone bills/records for the phone number (231) 457-3661 from January 1, 2019 through May 15, 2019.

RESPONSE:

Objection. Plaintiff objects to Request No. 1 to the extent that it is overly broad.

Without waiving the above objection, Plaintiff refers Defendants to Exhibit 9 (Comcast Call Detail Log for Lori Heethuis' cell phone number (231) 457-3661), and Exhibit 10 (Comcast Call Detail Log for Damon Heethuis' cell phone number (231) 457-3669). Plaintiff Lori Heethuis' call detail log received from Comcast is from March 24, 2019 to May 1, 2019. Damon Heethuis' call detail log received from Comcast is provided for the dates of March 24, 2019 and April 17, 2019. Plaintiff is sending Damon Heethuis' call log to show that the recorded call Plaintiff Lori Heethuis made to her husband on March 24, 2019 was actually made at 5:08 p.m. Plaintiff believes the 9:08 p.m. entry on her call detail log for March 24, 2019 is an error.

Plaintiff reserves the right to supplement her response, as discovery is ongoing.

2. Produce the "file" about which Plaintiff testified at her deposition that she allegedly copied and which she believes to contain information placed in this file by Nate Stephenson.

RESPONSE:

Plaintiff's personnel files that she received from Defendant and dropped off are attached as Exhibits 11 and 12.

Dated: November 2, 2020

By: 

Stephen R. Drew (P24323)
Adam C. Sturdivant (P72285)
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E-mail: mhesano@rsjalaw.com

CERTIFICATE OF SERVICE

I, Stephen R. Drew, certify that I am an attorney with the law firm of DREW COOPER & ANDING, and on November 2, 2020, **Plaintiff's Response to Defendants' Second Request for Production of Documents** was served via *Electronic Mail* on counsel for Defendants at the email addresses listed above.

I declare the above information is true to the best of my knowledge, information, and belief.

Dated: November 2, 2020

By: /s/ Stephen R. Drew

Stephen R. Drew (P24323)
DREW COOPER & ANDING
Attorneys for Plaintiff
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Grand Rapids, Michigan 49503
Phone: (616) 454-8300
E-mail: sdrew@dca-lawyers.com

CALL_DATE	CALL_TIME	TIMEZONE	MDN_NUMBER	TO_NUMBER	CALL_DURATION (MINUTES)	CALL_DIRECTION (IN/OUT)
20190324	100815	-4	2314573669	2317246351	4	I
20190324	110128	-4	2314573669	2317246331	1	O
20190324	110224	-4	2314573669	2317246331	1	O
20190324	110501	-4	2314573669	2317246351	1	I
20190324	112042	-4	2314573669	8004802265	1	O
20190324	123626	-4	2314573669	2317883806	9	I
20190324	170816	-4	2314573669	2314573661	8	I
20190324	184814	-4	2314573669	2314573661	2	O
20190325						
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CALL_DATE	CALL_TIME	TIMEZONE	MDN_NUMBER	TO_NUMBER	CALL_DURATION (MINUTES)	CALL_DIRECTION (IN/OUT)
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CALL_DATE	CALL_TIME	TIMEZONE	MDN_NUMBER	TO_NUMBER	CALL_DURATION (MINUTES)	CALL_DIRECTION (IN/OUT)
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20190413						
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20190417	162427	-4	2314573669	2314573661	6	I
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CALL_DATE	CALL_TIME	TIMEZONE	MDN_NUMBER	TO_NUMBER	CALL_DURATION (MINUTES)	CALL_DIRECTION (IN/OUT)
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CALL_DATE	CALL_TIME	TIMEZONE	MDN_NUMBER	TO_NUMBER	CALL_DURATION (MINUTES)	CALL_DIRECTION (IN/OUT)
20190324	184814	-4	2314573661	2314573669	2	I
20190324	204711	0	2314573661	2312159988	8	O
20190324	210816	0	2314573661	2314573669	8	O
20190325	162535	-4	2314573661	2317600600	1	O
20190325	162912	-4	2314573661	2317246308	3	O
20190325	163909	-4	2314573661	2317600600	3	O
20190325	183645	-4	2314573661	2314573669	3	O
20190326	123041	-4	2314573661	2314573669	7	O
20190326	161648	-4	2314573661	2317247175	2	O
20190326	161956	-4	2314573661	2314573669	3	O
20190326	162330	-4	2314573661	4042545961	1	O
20190326	162500	-4	2314573661	2314573669	16	O
20190326	201635	-4	2314573661	23176000100	2	I
20190326	215438	-4	2314573661	2314573669	7	O
20190327	112714	-4	2314573661	2312061718	2	I
20190327	112931	-4	2314573661	2314573669	1	O
20190327	113032	-4	2314573661	4042545961	1	O
20190327	114354	-4	2314573661	2317993300	2	O
20190327	115239	-4	2314573661	2314573669	12	I
20190327	121441	-4	2314573661	2314573669	21	I
20190327	135153	-4	2314573661	8007676377	12	O
20190327	145001	-4	2314573661	4042545961	1	O
20190327	170645	-4	2314573661	23176000100	47	I
20190327	200049	-4	2314573661	4042545961	1	O
20190328	90014	-4	2314573661	2317993300	3	O
20190328	180437	-4	2314573661	4042545961	1	O
20190328	191038	-4	2314573661	4042545961	1	O
20190329	101831	-4	2314573661	2317993300	2	O
20190329	120532	-4	2314573661	2317266355	1	O
20190329	154210	-4	2314573661	2314573669	2	O
20190329	160548	-4	2314573661	2317600600	1	O
20190329	160641	-4	2314573661	2317696499	2	O
20190329	173306	-4	2314573661	4042545961	1	O

CALL_DATE	CALL_TIME	TIMEZONE	MDN_NUMBER	TO_NUMBER	CALL_DURATION (MINUTES)	CALL_DIRECTION (IN/OUT)
20190329	174858	-4	2314573661	2317696499	10	I
20190329	213005	-4	2314573661	2312150344	26	O
20190330	113118	-4	2314573661	2317266355	4	O
20190330	120810	-4	2314573661	8777047338	2	O
20190330	155957	-4	2314573661	4042545961	1	O
20190330	162503	-4	2314573661	4042545961	1	O
20190330	175517	-4	2314573661	2317600600	7	O
20190331	161728	-4	2314573661	2317246308	1	O
20190331	162436	-4	2314573661	2314573669	10	O
20190331	220830	-4	2314573661	4042545961	1	O
20190401	134923	-4	2314573661	4042545961	1	O
20190401	162016	-4	2314573661	2314573669	5	O
20190401	162513	-4	2314573661	2317600600	2	O
20190402	115342	-4	2314573661	2317558214	3	O
20190402	162258	-4	2314573661	2314573669	8	O
20190403	11347	-4	2314573661	4042545961	1	O
20190403	62452	-4	2314573661	2317246351	1	O
20190404	161755	-4	2314573661	2317199200	4	O
20190404	164923	-4	2314573661	2313758660	9	I
20190404	180519	-4	2314573661	4042545961	1	O
20190405	110824	-4	2314573661	4042545961	2	O
20190405	111844	-4	2314573661	4042545961	1	O
20190405	111931	-4	2314573661	2317600600	2	O
20190405	112232	-4	2314573661	2314573669	1	O
20190405	121531	-4	2314573661	2317600600	2	O
20190405	122256	-4	2314573661	2316724663	2	O
20190405	122431	-4	2314573661	2316724663	4	O
20190405	123512	-4	2314573661	4042545961	1	O
20190405	131220	-4	2314573661	2314573669	2	I
20190405	132504	-4	2314573661	2317199200	2	O
20190405	143338	-4	2314573661	2317600600	2	O
20190405	161146	-4	2314573661	6164853055	5	O
20190405	163403	0	2314573661	2317378446	6	O

CALL_DATE	CALL_TIME	TIMEZONE	MDN_NUMBER	TO_NUMBER	CALL_DURATION (MINUTES)	CALL_DIRECTION (IN/OUT)
20190405	172802	-4	2314573661	2314573669	6	O
20190405	174039	-4	2314573661	2317600600	3	O
20190406	130043	-4	2314573661	4042545961	1	O
20190406	132831	-4	2314573661	4042545961	1	O
20190406	141218	-4	2314573661	2314573669	2	O
20190406	162047	-4	2314573661	2314573669	2	I
20190406	172248	-4	2314573661	2317444718	2	O
20190406	183939	-4	2314573661	2319031415	3	I
20190406	203910	-4	2314573661	2317600600	15	O
20190407	62448	-4	2314573661	2314573669	2	O
20190407	184953	-4	2314573661	23176000100	2	I
20190408	94405	-4	2314573661	4042545961	1	O
20190408	150512	0	2314573661	2317444718	1	I
20190408	155854	-4	2314573661	4042545961	1	O
20190408	164944	-4	2314573661	2314573669	1	O
20190409	20410	-4	2314573661	4042545961	1	O
20190409	160545	-4	2314573661	2314573669	8	O
20190409	165446	-4	2314573661	4042545961	1	O
20190409	171517	-4	2314573661	3193455508	1	I
20190409	213812	-4	2314573661	4042545961	1	O
20190410	151658	-4	2314573661	4042545961	1	O
20190410	160345	-4	2314573661	2314573669	2	O
20190410	162533	-4	2314573661	2312159988	18	O
20190410	185020	-4	2314573661	4042545961	1	O
20190410	192221	-4	2314573661	2314573669	13	O
20190410	194337	-4	2314573661	6164853055	3	O
20190410	200035	-4	2314573661	6164853055	16	I
20190411	95350	-4	2314573661	4042545961	1	O
20190411	161613	-4	2314573661	2317600600	23	O
20190411	164153	-4	2314573661	2314573669	2	I
20190411	182327	-4	2314573661	4042545961	1	O
20190412	112354	-4	2314573661	2315781894	8	O
20190412	124413	-4	2314573661	2317600600	1	O

CALL_DATE	CALL_TIME	TIMEZONE	MDN_NUMBER	TO_NUMBER	CALL_DURATION (MINUTES)	CALL_DIRECTION (IN/OUT)
20190412	141456	-4	2314573661	2317600600	1	O
20190412	145556	-4	2314573661	2317600600	1	O
20190412	150351	-4	2314573661	4042545961	1	O
20190412	150954	-4	2314573661	2317600600	1	O
20190412	151023	-4	2314573661	2317600600	1	I
20190412	160200	-4	2314573661	2314573669	1	O
20190412	170636	-4	2314573661	4042545961	1	O
20190412	212233	-4	2314573661	4042545961	1	O
20190412	213118	-4	2314573661	2317246308	1	O
20190412	213153	-4	2314573661	2317246308	1	O
20190414	165427	-4	2314573661	2314573669	1	I
20190414	170313	-4	2314573661	2317600600	10	O
20190414	181434	-4	2314573661	2312061718	4	O
20190414	184811	-4	2314573661	2312061718	18	I
20190415	101214	-4	2314573661	4042545961	1	O
20190415	123531	-4	2314573661	2316726989	2	I
20190415	164420	-4	2314573661	4042545961	1	O
20190415	173025	-4	2314573661	2314573669	4	O
20190416	90643	-4	2314573661	4042545961	1	O
20190416	165910	-4	2314573661	2314573669	8	O
20190416	205027	-4	2314573661	2317600600	10	O
20190417	32831	-4	2314573661	4042545961	1	O
20190417	162427	-4	2314573661	2314573669	6	O
20190417	172843	-4	2314573661	4042545961	2	O
20190417	174638	-4	2314573661	2317600600	10	O
20190418	183012	-4	2314573661	2312150344	1	O
20190418	184012	-4	2314573661	2312150344	1	O
20190418	193149	-4	2314573661	2314573669	1	O
20190419	10625	-4	2314573661	4042545961	1	O
20190419	105655	-4	2314573661	2317600600	2	I
20190419	110009	-4	2314573661	2317600600	2	I
20190419	133526	-4	2314573661	23157818940	84	I
20190419	153037	-4	2314573661	2317266355	1	O

CALL_DATE	CALL_TIME	TIMEZONE	MDN_NUMBER	TO_NUMBER	CALL_DURATION (MINUTES)	CALL_DIRECTION (IN/OUT)
20190419	153830	-4	2314573661	2317600600	1	I
20190419	153904	-4	2314573661	2317600600	1	O
20190419	154350	-4	2314573661	4042545961	1	O
20190419	155417	-4	2314573661	2317600600	4	O
20190419	182012	-4	2314573661	2314573669	9	O
20190419	224136	-4	2314573661	23176000100	8	I
20190420	102304	-4	2314573661	2317600010	3	O
20190420	102516	-4	2314573661	2317600010	2	O
20190420	105313	-4	2314573661	2314573669	3	I
20190420	193743	-4	2314573661	2314573669	2	O
20190420	193914	-4	2314573661	2317600600	6	O
20190421	180830	-4	2314573661	2315573762	1	O
20190421	184502	-4	2314573661	2314573669	7	O
20190421	220926	0	2314573661	2315573762	12	O
20190422	112046	-4	2314573661	2317444718	1	I
20190423	92857	-4	2314573661	2312061718	1	O
20190423	94550	-4	2314573661	4042545961	1	O
20190423	95056	-4	2314573661	6164548300	1	O
20190423	95149	-4	2314573661	6164548300	1	O
20190423	95247	-4	2314573661	6164853055	2	O
20190423	103353	-4	2314573661	2314573669	6	O
20190423	121255	-4	2314573661	2316688934	1	I
20190423	165625	-4	2314573661	3124046027	2	O
20190423	170253	-4	2314573661	4042545961	3	O
20190423	182040	-4	2314573661	31240460270	10	I
20190423	213252	-4	2314573661	23176000100	7	I
20190424	102113	-4	2314573661	6164548300	6	I
20190424	105134	-4	2314573661	4042545961	1	O
20190424	135932	-4	2314573661	2314573669	2	O
20190424	143519	-4	2314573661	2314573669	12	I
20190424	211046	-4	2314573661	23176000100	9	I
20190425	82157	-4	2314573661	4042545961	1	O
20190425	111725	-4	2314573661	2314573669	7	O

CALL_DATE	CALL_TIME	TIMEZONE	MDN_NUMBER	TO_NUMBER	CALL_DURATION (MINUTES)	CALL_DIRECTION (IN/OUT)
20190425	130534	-4	2314573661	4042545961	1	O
20190425	141804	-4	2314573661	2317266355	2	O
20190425	171100	-4	2314573661	2317993300	1	O
20190425	171533	-4	2314573661	6164853055	27	I
20190426	92554	-4	2314573661	2317666157	5	I
20190426	105154	-4	2314573661	2314573669	8	O
20190426	110121	-4	2314573661	2317244716	17	O
20190426	114325	-4	2314573661	2317246236	2	O
20190426	121651	-4	2314573661	2314127998	1	O
20190426	122629	-4	2314573661	2317600600	6	O
20190426	123904	-4	2314573661	2317993300	3	O
20190426	132951	-4	2314573661	6164853055	13	O
20190426	152051	-4	2314573661	4042545961	1	O
20190426	152238	-4	2314573661	2317993300	2	I
20190426	153648	-4	2314573661	2314127998	2	O
20190426	154241	-4	2314573661	2317600600	17	O
20190426	161133	-4	2314573661	2315573762	8	O
20190426	164103	-4	2314573661	2314127998	40	I
20190426	193946	-4	2314573661	2314127998	2	O
20190427	131640	-4	2314573661	2314970009	1	O
20190427	133958	-4	2314573661	2317444718	1	I
20190428	94425	-4	2314573661	2314573669	2	I
20190428	101737	-4	2314573661	23176000100	2	I
20190428	183041	-4	2314573661	4042545961	1	O
20190429	84305	-4	2314573661	4042545961	1	O
20190429	95056	-4	2314573661	4042545961	1	O
20190429	124829	-4	2314573661	2314573669	4	I
20190429	125224	-4	2314573661	2314573669	2	I
20190429	140347	-4	2314573661	2312150344	49	I
20190429	154841	-4	2314573661	23176000100	14	I
20190429	160215	-4	2314573661	2314573669	2	I
20190429	160448	-4	2314573661	2317247101	2	O
20190429	160704	-4	2314573661	2317600010	2	O

CALL_DATE	CALL_TIME	TIMEZONE	MDN_NUMBER	TO_NUMBER	CALL_DURATION (MINUTES)	CALL_DIRECTION (IN/OUT)
20190429	161530	-4	2314573661	2317244716	4	I
20190429	161936	-4	2314573661	2314573669	1	O
20190429	162057	-4	2314573661	2314573669	4	I
20190429	173130	-4	2314573661	4042545961	1	O
20190429	173207	-4	2314573661	4042545961	1	O
20190429	204420	-4	2314573661	2312150344	45	I
20190430	85242	-4	2314573661	23157818940	18	I
20190430	94216	-4	2314573661	2314573669	1	I
20190430	110322	-4	2314573661	2317244447	1	O
20190430	110358	-4	2314573661	2317246308	1	O
20190430	112318	-4	2314573661	7346264942	1	I
20190430	114627	-4	2314573661	2317244716	1	O
20190430	114650	-4	2314573661	2317246442	5	O
20190430	163648	-4	2314573661	4042545961	1	O
20190430	195228	-4	2314573661	2317696499	42	I
20190501	112704	-4	2314573661	2314573669	28	I
20190501	120853	-4	2314573661	2317600600	20	I
20190501	131946	-4	2314573661	2314573669	2	I
20190501	163953	-4	2314573661	2314573669	1	I
20190501	192319	-4	2314573661	61684318060	32	I